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Carl.A.Johnson@fakeaddress.net on 10/05/2001 03:59:59 PM



To: psse@notes.ymp.gov, bonnie.fogdall@notes.ymp.gov
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Subject: PSSE Comment

Part of Records Package / Supplement / Correction

October 05, 2001 15:59:59

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---> Commentors Name: Mr. Carl A Johnson
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--> Comment Text :
I am a retired geologist whose professional experience includes 15 years with the Nevada Agency for Nuclear Projects and prior investigations and consulting on siting and licensing of critical facilities including nuclear power plants.

Critical facilities are those which are subject to some aspect of public health and safety concerns, such as power plants, dams, pipelines. Yucca Mountain is such a facility, and as such is subject to siting and licensing requirements of the NRC and the EPA. The process of investigation of a site utilizing siting and licensing requirements as a basis is defined as site characterization. At Yucca Mountain site characterization has been ongoing since the early 1980's.

Part of a typical site characterization involves the identification of so-called "fatal flaws," geologic features or hazards which would make the site unsuitable for protecting public health and safety. For a nuclear waste repository, the NRC and the EPA have determined that earthquake hazards such

as high level of seismic shaking and repository fault rupture, rapid water and water vapor transport away from the repository, and the possibility of future volcanic eruption at the site are considered fatal flaws. Presence of such hazards renders the site not suitable for a nuclear waste repository.

To date no such fatal flaw investigations have been performed at Yucca Mountain. The only investigations which have been performed are those which developed evidence to support the preconceived notion that the site is acceptable and a reluctance or even refusal to consider evidence which might contradict site acceptability. No demonstrative geologic evidence has been presented in any DOE documents that fatal flaws do not exist at the Yucca Mountain site. All evidence presented to date is subjective based on the opinion of scientists, not on fact. High quality, well designed and executed fatal flaw investigations must be performed and the proof developed that no fatal flaws exist at Yucca Mountain before the public can have confidence that the site is safe for this and future generations.

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